

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FORT SMITH DIVISION**

UNITED STATES OF AMERICA

PLAINTIFF

VS.

CASE NO. 2:20CR20017-001-018

MANUEL DE JESUS PEREZ-ECHEVERRIA

DEFENDANT

MOTION TO WITHDRAW

COMES NOW Ken Osborne, of the Osborne & Wilmoth Law Firm, and for his Motion to Withdraw as counsel for Defendant, Manuel De Jesus Perez-Echeverria, states as follows:

1. That Ken Osborne moves the Court for permission to withdraw as counsel of record for Manuel De Jesus Perez-Echeverria.
2. That Ken Osborne has taken reasonable steps to avoid any foreseeable prejudice to the rights of Manuel De Jesus Perez-Echeverria. Notice of this motion has been provided to Manuel De Jesus Perez-Echeverria.
3. That Ken Osborne spoke with Manuel De Jesus Perez-Echeverria via Zoom on January 19th, 2021. After about 5 minutes he told me I was fired, and I no longer represented him. He will not cooperate, and I therefore cannot properly represent him.

WHEREFORE, Ken Osborne, prays that he be allowed to withdraw as counsel for Manuel De Jesus Perez-Echeverria in the above-styled matter.

RESPECTFULLY SUBMITTED
KEN OSBORNE

By: 

Ken Osborne, ABA #87128
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on January 22nd, 2021, I have electronically filed the foregoing with the Clerk of Court using the CM/ECF System which will send electronic notification of such filing to all proper parties.

/s/ Ken Osborne
KEN OSBORNE